
From: Norm Caouette
Sent: Tuesday, August 05, 2008 5:09 PM
To: Tuerpe, Michael
Cc: Valerie Wiegenstein; rcwagner; Norm Caouette
Subject: FW: Juniper Riviera CWD

Michael –

We generally do not offer opinions supporting or opposing proposed boundary changes but are willing to provide information that you might consider.

The Mojave Basin Area Judgment does not explicitly prohibit a purveyor (or any producer) from expanding from one subarea into another. We currently do have a boundary cross-over in another part of the adjudicated area that pre-existed entry of Judgment, which has resulted in additional analysis that is needed each year when Watermaster staff perform the annual production verification. There is a second location where we have a water district with subarea overlap but production and use is currently only occurring within one subarea.

LAFCO's service review should consider a few things related to water supply and the ability of the JRCWD to adequately serve the expansion area.

- 1) Subarea source of pumped water
- 2) Subarea receiving return flow
- 3) JRCWD would need Alto Free Production Allowance to pump for use in Alto (or incur a Replacement Water Obligation for all production there)
- 4) JRCWD should preferably pump water for Alto use in Alto and have related return flow in Alto
- 5) Supply and recharge are limited in Este so an export from Este that resulted in increased pumping for service in Alto (even though the pumping might be subject to Este Replacement water) could result in stress to the Este water supply source.

Watermaster would typically look at a proposed expansion from a hydrologic balance perspective, meaning that both Este and Alto need to remain whole. The issue is complicated and it would have been preferable to have an opportunity to further review and discuss this prior to providing information to LAFCO, but I understand from your email that you are time constrained. It would have been useful to have Watermaster staff review maps of the geology, location of wells (existing and proposed), and to find out what JRCWD has in mind for the future in both Este and Alto, assuming JRCWD plans are known. We also have the issue of "stayed rampdown" in Este (the Court has temporarily suspended rampdown of FPA there at 80% of Base Annual Production) that could result in a new management program for Este by the Court. It is not known at this time how such a modification could affect the proposed boundary change.

Norm Caouette